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M&D MARASHLIAN &
DONAHUE, LLC
THE COMMLAW GROUP

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July 24, 2014

AZ CORP COMMISSION
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Arizona Corporation Commission

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JUL 25 2014

VIA OVERNIGHT MAIL

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007-2927

DOCKETED BY

NR

**RE: Arizona Corporation Commission – Staff's Second Set of Data Requests for
Campus Communications Group, Inc. ("CCG") Docket No. T-20907A-14-
0075**

Dear Sir or Madam:

On behalf of Campus Communications Group, Inc. ("CCG" or "Applicant"), this letter responds to the June 19, 2014 letter requesting additional information from the Arizona Corporation Commission ("the Commission").

PJG 2-1. In response to (A-1) of its application, CCG indicated that it is requesting authority to provide facilities-based local exchange telecommunications services. In response to (A-15) of its application, CCG specified that it will not be providing services as a facilities-based provider of long distance or as a long distance reseller. Meanwhile, in response to PJG 1-19 of Staff's First Set of Data Requests, at item C. CCG described its Metered service as containing a rate of \$0.03/minute for a long distance call. In addition, at 3.10.1 on Original Page No. 41 of CCG's proposed Arizona Tariff No. 1, CCG's PRI Service contains a description stating "this service offers unlimited and US/Canada long distance calling". Based on the service description, it appears that CCG will be offering long distance telecommunications service as well as local exchange telecommunications services in Arizona.

Please file an amendment to the application specifying at (A-1) which types of telecommunications services that CCG is seeking authority to provide. In addition, please file an amendment to CCG's response to (A-15). Please file an original plus thirteen (13) copies of the amended responses with Docket Control.

RESPONSE: Applicant's current service offerings are IP-based services. All voice services, including long-distance phone calls, are provided via IP. Applicant has two phone packages:

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1420 SPRING HILL ROAD
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MCLEAN, VIRGINIA 22102

The Basic Package – offers users VoIP SIP trunk based free local calling. Long distance is billed at \$0.03/minute. International calls are charged at a rate of \$0.10/minute.

The Unlimited Package – offers users VoIP SIP trunk based free local and long distance calling to the U.S. and Canada. Users are limited to a monthly usage rate of 3,000 minutes. After exceeding 3,000 minutes all calls are billed at \$0.03/minute *except* international calls (excluding Canada) which are billed at \$0.10/minute at all times.

Applicant is seeking CLEC authority in order to have authorization to add non-VoIP local services in the future. Because Applicant's long distance services are IP-based, it is Applicant's understanding that IXC authority is not required. If staff believes separate IXC authority is necessary for the services Applicant intends to provide, Applicant will amend its application to include IXC authority or will file a separate application.

PJG 2-2 On Original Page No. 42 of CCG's proposed Intrastate Local Telephone Service Tariff, Arizona Tariff No. 1, at 3.11, Staff recommends that a replacement page be filed removing the words "and residential" if CCG will not be providing service to residential customers in Arizona.

RESPONSE: Applicant has made this revision and attached both redline and clean versions of Original Page No. 42 as **Attachment A**.

PJG 2-3 On Original Page No. 42 of CCG's proposed Intrastate Local Telephone Service Tariff, Arizona Tariff No. 1, Staff recommends adding more detailed descriptions to the Metered and Unlimited US services that CCG proposes to offer in Arizona. For instance, on Metered service, CCG may want to add "unlimited local calling with no cap on the number of local minutes used". Also, specify that long distance calls are billed at \$0.03/minute. On the Unlimited US service, information regarding the 3,000 minute cap and the rate of \$0.03/minute should be added as described in CCG's response to PJG 1-19. In addition, Staff recommends that CCG add the word "Current" in front of Monthly Rate to both of the proposed services on Original Page 42.

RESPONSE: Applicant has made these revisions and attached both redline and clean versions of Original Page No. 42 as **Attachment A**.

PJG 2-4 On Original Page No. 41 of CCG's proposed Intrastate Local Telephone Service Tariff, Arizona Tariff No. 1, Staff recommends adding more detailed descriptions to both of the PRI services similar to those recommended in PJG 2-3 above. In addition, Staff recommends that CCG add the word "Current" in front of Monthly Rate to all three of the proposed services on Original Page No. 41.

Page 3

RESPONSE: Applicant has decided not to provide PRI services in Arizona at this time, should this change Applicant will make all necessary revisions. Therefore, Applicant has removed Section 3.10 related to PRI services and has instead reserved this space for future use. Attached is the redline and clean versions of Original Page No. 41 as **Attachment B**.

PJG 2-5 Please explain how the use of CCG's "packaged" service offerings of local and long distance at a wholesale level would impact the requirement for equal access.

RESPONSE: Applicant does not currently nor does it intend to provide services at a wholesale level.

Should you have any questions regarding these responses or require further information, please contact the undersigned at ymp@commlawgroup.com or (703) 714-1309.

Respectfully submitted,



Vineetha Pillai
Counsel for Campus Communications Group, Inc.

cc: Pamela J. Genung (via e-mail)

ATTACHMENT A

Arizona Tariff No. 1, Original Page No. 42

INTRASTATE LOCAL TELEPHONE SERVICE

3.11 Analog Line Service

The Company's Analog Line Service is offered to business and residential customers for inbound and outbound calling. This service includes the cost of transport from the serving CO to the demarc at the Customer's premise.

Technical Information:

2 wire analog loop start interface. Includes calling number ID, call waiting, 3 way calling, call forwarding and distinctive ring.

3.11.1 Metered

Current Monthly Rate: \$19.95
Maximum Rate: \$59.85

Activation Charge: \$49.95

Description:

~~This service offers measured local calling at \$0.03/minute.~~ The Basic Package – offers users free unlimited local calling with no cap on the number of local minutes used. Long distance calling is billed at \$0.03/minute and international calls are charged at a rate of \$0.10/minute.

3.11.2 Unlimited US

Current Monthly Rate: \$39.95
Maximum Rate: \$119.85

Activation Charge : \$49.95

Description:

~~This service offers unlimited and US/Canada long distance calling.~~ The Unlimited Package – offers users free local and long distance calling to the U.S. and Canada. Users with usage patterns exceeding 3,000 minutes per phone line per month may be charged at a rate of \$0.03/minute (for both local and long distance) in excess for the billing cycle, except international calls (excluding Canada) which are billed starting at \$0.10/minute at all times (rate varies based on country).

Issued: February 24, 2014**Effective:**

Issued By: Mark Scifres, Chief Executive Officer
Campus Communications Group, Inc.
P.O. Box 25
Champaign, IL 61824

INTRASTATE LOCAL TELEPHONE SERVICE

3.11 Analog Line Service

The Company's Analog Line Service is offered to business customers for inbound and outbound calling. This service includes the cost of transport from the serving CO to the demarc at the Customer's premise.

Technical Information:

2 wire analog loop start interface. Includes calling number ID, call waiting, 3 way calling, call forwarding and distinctive ring.

3.11.1 Metered

<i>Current Monthly Rate:</i>	\$19.95
<i>Maximum Rate:</i>	\$59.85

<i>Activation Charge:</i>	\$49.95
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Description:

The Basic Package – offers users free unlimited local calling with no cap on the number of local minutes used. Long distance calling is billed at \$0.03/minute and international calls are charged at a rate of \$0.10/minute.

3.11.2 Unlimited US

<i>Current Monthly Rate:</i>	\$39.95
<i>Maximum Rate:</i>	\$119.85

<i>Activation Charge</i>	:	\$49.95
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Description:

The Unlimited Package – offers users free local and long distance calling to the U.S. and Canada. Users with usage patterns exceeding 3,000 minutes per phone line per month may be charged at a rate of \$0.03/minute (for both local and long distance) in excess for the billing cycle, *except* international calls (excluding Canada) which are billed starting at \$0.10/minute at all times (rate varies based on country).

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ATTACHMENT B

Arizona Tariff No. 1, Original Page No. 41

INTRASTATE LOCAL TELEPHONE SERVICE

3.10 Reserved For Future Use. PRI Service (Inbound and Outbound)

The Company's PRI Service is offered to business customers for inbound and outbound calling. Additional phone numbers, including multiple rate centers (NPA/XXX) may be added.

Technical Information:

23B channels and 1 D channel delivered either via DS-1 or multiplexed DS-3. NFAS and NFAS with backup are available when using 2 or more PRIs. Includes CLID, AMI or B8ZS, SF or ESF, and National/ESS/DMS PRI compatibility.

3.10.1 PRI Service (Unlimited US)

Monthly Rate: \$918.85
Maximum Rate: \$2756.55

Activation Charge: \$1,148.85

Description:

This service offers unlimited and US/Canada long distance calling.

3.10.2 PRI Service (Metered)

Monthly Rate: \$458.85
Maximum Rate: \$1376.55

Activation Charge: \$1,148.85

Description:

This service offers measured local calling at \$0.03/minute.

3.10.3 100 Number DID Block

Monthly Rate: \$64.95
Maximum Rate: \$194.85

Activation Charge (no contract): \$49.95

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Arizona Tariff No. 1
Original Page No. 41

INTRASTATE LOCAL TELEPHONE SERVICE

3.10 Reserved For Future Use.

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